

Magistrate Judge Paula L. McCandlis

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
MARC DAVID MCCOOL,  
  
Defendant.

NO. MJ24-297  
COMPLAINT for VIOLATION  
Title 18, United States Code,  
Sections 2422(b), 2423(b)

BEFORE the Honorable Paula L. McCandlis, United States Magistrate Judge,  
United States Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**

**(Attempted Enticement of a Minor)**

Between on or about April 5, 2024, and on or about May 16, 2024, in King County, within the Western District of Washington, and elsewhere, MARC DAVID MCCOOL, used a means and facility of interstate and foreign commerce, to include the internet and a cellular telephone, to knowingly persuade, induce, entice, and coerce, and attempt to do so, an individual who had not attained the age of 18 years to engage in sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(b).

**COUNT 2****(Travel with Intent to Engage in a Sexual Act with a Minor)**

On or about May 16, 2024, in King County, within the Western District of Washington, and elsewhere, the defendant, MARC DAVID MCCOOL, did knowingly travel in interstate commerce, to wit from Portland, Oregon, to Seattle, Washington, for the purpose of engaging in illicit sexual conduct, that is, a sexual act, as that term is defined in 18 U.S.C. § 2246, with a person(s) under the age of eighteen, which sexual act would constitute a violation of Title 18, United States Code, Chapter 109A.

All in violation of Title 18, United States Code, Section 2423(b).

And the Complainant states that this Complaint is based on the following information:

I, Audrey Ngadiran, being first duly sworn on oath, depose and say:

**I. INTRODUCTION**

1. I have been an agent with Homeland Security Investigations (HSI) since April 2021. HSI is responsible for enforcing customs and immigration laws and federal criminal statutes of the United States. In my capacity as an agent, I am responsible for conducting investigations into the numerous federal laws enforced by HSI. As part of my duties, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, importation, distribution, receipt, attempted receipt, and possession of child pornography and material involving the sexual exploitation of minors in violation of 18 U.S.C. §§ 2251, 2252(a), 2252A(a), 2422, and 2423. I have worked with agents involved in numerous investigations involving the sexual exploitation of children or the distribution, receipt, and possession of child pornography. I have participated in searches of premises and assisted in gathering evidence pursuant to search warrants, including search warrants in multiple child pornography investigations. I have participated in interviews of persons who possess and distribute child pornography.

2. I am a graduate of the Federal Law Enforcement Training Center (FLETC), HSI Special Agent Training Program, and have received further specialized training in investigating child pornography and child exploitation crimes. In the course of my

1 employment, I have also observed and reviewed examples of child pornography (as defined  
2 in 18 U.S.C. § 2256(8)). My training included courses in law enforcement techniques,  
3 federal criminal statutes, conducting criminal investigations, and the execution of search  
4 warrants. I have participated in the execution of search warrants which involved child  
5 exploitation and/or child pornography offenses and the search and seizure of computers,  
6 related peripherals, and other electronic devices.

7 3. My training included courses in law enforcement techniques, federal criminal  
8 statutes, conducting criminal investigations, and the execution of search warrants. I have  
9 participated in the execution of several search warrants which involved child exploitation  
10 and/or child pornography offenses and the search and seizure of computers and other digital  
11 devices. I have observed and reviewed numerous examples of child pornography in various  
12 forms of media, including media stored on digital media storage devices such as computers,  
13 tablets, cellphones, etc.

14 4. I am a member of the Internet Crimes Against Children (ICAC) Task Force in  
15 the Western District of Washington (WDWA), and work with other federal, state, and local  
16 law enforcement personnel in the investigation and prosecution of criminal violations  
17 relating to child exploitation and child pornography, including violations pertaining to the  
18 unlawful production, importation, distribution, receipt, attempted receipt, and possession of  
19 child pornography and material involving the sexual exploitation of minors in violation of  
20 United States Code §§ 2243(a)(1), 2251, 2252(a), 2252A(a)(4)(B), 2422, and 2243(a)(1).

21 5. As further detailed below, based on my investigation and the investigation of  
22 other law enforcement officers, I believe there is probable cause to conclude that MARC  
23 DAVID MCCOOL has committed the offense charged in this complaint namely,  
24 Attempted Enticement of a Minor in violation of Title 18, United States Code, Section  
25 2422(b), and Travel with the Intent to Engage in a Sexual Act with a Minor in violation of  
26 18 U.S.C. § 2423(b).

27 6. The information contained in this affidavit consists of my personal knowledge  
28 gained through this investigation, information provided by other law enforcement agencies

involved in this investigation, information provided by witnesses and others with knowledge of the relevant events and circumstances, information gleaned from my review of evidence, and my training and experience. Because this affidavit is offered for the limited purpose of establishing probable cause, I list only those facts that I believe are necessary to support such a finding. I do not purport to list every fact known to me or others as a result of this investigation.

## II. SUMMARY OF INVESTIGATION

7. In April 2024, HSI Seattle conducted an undercover online chatting operation with the mission of identifying and locating individuals who have a sexualized interest in children. During the investigation, one suspect on Kik, later identified as MARK DAVID MCCOOL, informed an HSI undercover agent (UCA) that he resided in the Portland, Oregon (OR) area and was willing to travel to the greater Seattle, Washington area to engage in sexual activity with the UCA's 7-year-old and 11-year-old children. While communicating with the UCA via Kik, MCCOOL also admitted to collecting child sexual abuse material (CSAM) in the past on a prior phone, committing hands-on sexual acts on minor children, and possessing undergarments of children he has historically sexually abused.

8. The UCA initially posted an advertisement on a social media platform providing a Kik username for interested parties to message. On April 5, 2024, the UCA received a message on Kik from "NastyDaddy60" with a display name of "Marc MCCOOL." The "NastyDaddy60" Kik user also had a profile photo of a white male with short hair with what appears to be a sepia filter applied to the photo. The profile also had a background photo of a white male with a mixed red- and white-haired beard and mustache, blue eyes, and black rimmed glasses. Based on a review of MCCOOL's Oregon Driver's License photograph and the profile images of the "NastyDaddy60" Kik account, all images appear consistent with MCCOOL.

9. During documented conversations with the UCA, MCCOOL stated that he wanted to teach the UCA's children *"How important it is to build their oral skills...to train them away from the word no and embrace the word yes...to teach them that their bodies are*

1 *instruments of pleasure to be devoted given.*” Between April 5, 2024, through May 16, 2024,  
2 the UCA and MCCOOL exchanged approximately hundreds of messages in which  
3 MCCOOL specified several of the sexual acts he wanted to engage in with the UCA’s  
4 children which included anal and digital penetration. When asked if MCCOOL intended to  
5 take photos or videos of the sexual activity with the UCA’s children, MCCOOL responded  
6 that he would.

7 10. When asked if MCCOOL collected child sexual abuse material (CSAM),  
8 MCCOOL said that he previously did, but reported that his phone that contained the CSAM  
9 was lost when it fell overboard on a fishing trip. MCCOOL stated that he had approximately  
10 a “*couple hundred and fifty vids*” of CSAM. When asked if he kept any other trophies,  
11 MCCOOL stated that he possessed some “*panties*” that were from “*A few lils I was lucky*  
12 *enough to play with over the years*” which included his daughter’s friend, and other children  
13 ranging from ages eight to eleven-years-old. MCCOOL stated that he missed engaging in  
14 sexual activity with children and that it had been approximately eight to nine years since he  
15 last had sexual contact with a child. When asked how MCCOOL sexually satisfied himself in  
16 the meantime and if he downloaded CSAM to sexually satisfy himself, MCCOOL stated, “*I*  
17 *watch...I have tried a few times to hook up but something just seemed off about it so I have it*  
18 *a pass.*”

19 11. When asked if MCCOOL had ever explored hurtcore before, MCCOOL  
20 responded that he has to an extent clarified that he has engaged in “*electro stuff, violet wand*  
21 *and tens unit...really severe canings and whipping...waterboarding...*”<sup>1</sup> MCCOOL stated  
22 that he had engaged in hurtcore in the past with a 12-year-old child, describing it as “*intense*  
23 *and fucking beautiful*” and further described the abuse, stating that he “*Caned the shit out of*  
24 *her, stuck peeled ginger in her ass and squeezed lemon juice over her skin where it broke*  
25

26  
27 <sup>1</sup> Hurtcore, a portmanteau of the words “hardcore” and “hurt”, is a name given to a particularly extreme form of child  
28 pornography, usually involving degrading violence, bodily harm, and murder relating to child sexual abuse. It has been  
described as a fetish for people who get aroused by the infliction of pain, or even torture, on another person who is not a  
willing participant.

1 *from the caning.”* Additionally, MCCOOL also claimed to have begun sexually abusing a  
 2 child to whom he had access at the age of six, stating that he had taught that child how to  
 3 “*deep throat*” and got her “*trained for anal*.”

4 *Review of Digital Communications Between the UCA and MCCOOL*

5 12. On May 15, 2024, I reviewed the chats between MCCOOL and the UCA.  
 6 MCCOOL repeatedly discussed plans to visit the UCA in Seattle, Washington for the  
 7 purpose of having sexual contact with the UCA’s fictitious minor children. The chats are  
 8 described, in part, below:

9 *April 5, 2024:*

10 **MCCOOL:** I love taboo mommies, and I’m just down the road in Portland

11 **MCCOOL:** Dom4yngslave from fet

12 **UCA:** Mmm hey what kinda taboo u into?

13 **MCCOOL:** I love one big happy family

14 **UCA:** Me too... lookin 4 playmates for my lils. Raisin them in a luvn fam

15 **MCCOOL:** Mmmm...I love that. All lils need to know there’s no place like home!

16 **UCA:** Mhmm 7 n 11 girlies

17 **MCCOOL:** Nice! Such a sweet lil on to teach! Just think, the world is their  
 18 oyster...so many beautiful things to learn!!!

19 **MCCOOL:** Exactlyyy u have any lil to teach? Mine are all grown now, but I taught  
 20 My daughter growing up...I miss having a family that has all that love

21 **UCA:** Aw love that.. what did u teach her?

22 **MCCOOL:** I taught her that love is everywhere, and she never had to hold herself  
 23 back from expressing and sharing her love with her family. I taught her that she has  
 24 the amazing talents to give pleasure to her Daddy and mommy, and I taught her how  
 25 to ask Daddy for things

26 **MCCOOL:** I also taught her that sometimes, love can hurt

27 **MCCOOL:** 7 and 11 are such special ages

28 **UCA:** What would u wanna teach my lils

1       **MCCOOL:** How important it is to build their oral skills...to train them away from  
2       the word no and embrace the word yes...to teach them that their bodies are  
3       instruments of pleasure to be devoted given

4       **MCCOOL:** devotedly\*

5       **UCA:** Mhmm how would u teach em

6       **MCCOOL:** That it is their place to accept and take and enjoy whatever Daddy wants

7       **UCA:** With both?

8       **MCCOOL:** Of course! There will be no limits with family, mommy

9       **MCCOOL:** I'm serious ab findin ppl for meetups..

10       **MCCOOL:** And I am serious about being one of those people

11       **MCCOOL:** Can you host in Seattle?

12       **UCA:** Yes Seattle works for me

13       **MCCOOL:** Well, I am in Portland, so I am close enough...and I can host down  
14       here, too

15       **UCA:** Ok I prefer hosting bc my girls are more familiar here but I appreciate that

16       **MCCOOL:** Totally understand and okay with that.

17       **MCCOOL:** If this turns out as successful as I think it will be, then we can discuss  
18       road trips

19       **UCA:** When was the last time u were with a lil

20       **MCCOOL:** \***MCCOOL** sent a selfie style photo to the UCA which depicted a white  
21       male with white hair, handlebar mustache, goatee, and black rim glasses.

22       **MCCOOL:** I am very real, and very serious.

23       **MCCOOL:** It has been a few years, sadly

24       **MCCOOL:** Good..so when would you like us to move forward

25       **UCA:** I'm open to soon but when's the soonest u could

26       **MCCOOL:** Well, My work schedule is Friday thru Tuesday, so Wednesday and  
27       Thursday off  
28



1 UCA: Gotcha what kinds work are you in? I'm just a hairdresser so my sched is  
2 pretty flexible

3 **MCCOOL:** I'm a chef, so I am kinda locked in, but I have some flexibility too

4 UCA: I know it's last min but if ur free tomorrow nite my girls just started spring  
5 break so could be a fun start

6 **MCCOOL:** Hmmm...it could happen. But I'd have to take the train to Seattle. My  
7 car is in the shop. How would that work with you

8 UCA: I'm in west Seattle w the girls so you'd prob need to find a ride to meet us

9 **MCCOOL:** I can uber

10 April 6, 2024:

11 UCA: What are u looking forward to most tomorrow

12 **MCCOOL:** Tomorrow? I look forward to meeting them...to seeing them. Exploring  
13 just how much they understand about family love

14 **MCCOOL:** Oh, it's real and it's a meetup

15 UCA: Hey Marc so what's the plan today?

16 **MCCOOL:** Hey...sorry for no contact. Just got released from the hospital. I was  
17 riding with My friend to the store to get lunch for the train when we got tboned.  
18 Ended up with a concussion and two cracked ribs

19 **MCCOOL:** So I'm going to need to recover for a few before any meetup can happen

20 April 7, 2024:

21 **MCCOOL:** I want to teach both about anal

22 UCA: Ok.. 7 too?

23 UCA: She never had cock

24 **MCCOOL:** Yes, but just fingers to start. I plan on this being a long term thing

25 UCA: U plan 2 take any pics?

26 **MCCOOL:** Yeah we'll see how is goes for pics. They'd be just for Me cause I'll  
27 want to jack off to them later

28 April 8, 2024:



UCA: Mhmmm can't wait.. u like 2 take pics or vids?

**MCCOOL:** Yes I do

**MCCOOL:** No faces ofc

UCA: U dnt collect?

**MCCOOL:** I wasn't suggesting now. And all My stuff was digital and for obvious reasons, not backed up. My phone, which held them all, got knocked overboard on a fishing trip last year so sadly, I lost them all

UCA: Omg tht sucks u evr take other tropies 2 keep? Ive kept panties b4

**MCCOOL:** I still have some panties, yes...pretty unicorn and pony ones

**MCCOOL:** Yeah it sucked a lot...I had a couple hundred and fifty vids

UCA: Mmm cute who we the panties from

**MCCOOL:** A few lils I was lucky enough to play with over the years. one pair was one of My daughters friends

**MCCOOL:** Oh yes...the ones I collected from her she was almost 12

**MCCOOL:** I had an 8 and two 10s...oh and one 13

**MCCOOL:** Yes they are...I loved it very much and miss having that in My life

UCA: How longs it been 4 u?

**MCCOOL:** Um...about 8-9 years

UCA: How u satisfy in the meantime u jus download yung? Or jus waitin

**MCCOOL:** I watch...I have tried a few times to hook up but something just seemed off about it so I have it a pass

April 22, 2024:

UCA: Hav u evr explord any hurtcore kinda stuf? I started hearin ab it but still pretty new 2 explorin

**MCCOOL:** Well, I've gone pretty deep into the pain aspect, but I certainly draw the line at death...that is so not My thing. I also think it's important to limit damage in order to avoid hospitals

April 23, 2024:

UCA: Cn I ask u mor ab the stuf u were talkin ab yesterday? Sry I'm stil curios

**MCCOOL:** I've done some electro stuff, violet wand and tens unit...really severe canings and whipping...waterboarding...

UCA: Oh wow evr w lils?

**MCCOOL:** Yes Mmm how old? 12

**MCCOOL:** It was intense and fucking beautiful

**MCCOOL:** Caned the shit out of her, stuck peeled ginger in her ass and squeezed lemon juice over her skin where it broke from the caning

UCA: Mmm we u worried shed tell at all?

**MCCOOL:** I'd used her before and mom had a good handle on her

UCA: Mmm I bet! U do tht w ur fam?

**MCCOOL:** With My daughter and first wife

UCA: How yng u start w her

**MCCOOL:** 6

UCA: Mhmm what was ur fav 2 do w her

**MCCOOL:** Teaching her deep throat and getting her trained for anal

May 7, 2024:

UCA: I havnt told the grls any deets yet bc I didnt want em 2 get excited if u flaked since we didn't kno wen

UCA: But theyll b so excited (smile emoji)

**MCCOOL:** That's cool, was just curious

UCA: U hv anythin u want want me 2 tell em 4 u?

**MCCOOL:** Tell them I can't wait to meet them and play with them and explore them and teach them

**MCCOOL:** and I look forward to which one has the most talented mouth... lol

UCA: Lol mkay I'll tell em (wink emoji)

24. On May 7, 2024, MCCOOL made tentative plans with the UCA to travel from Oregon to Seattle, Washington on May 16, 2024, for the purpose of having sexual contact

1 with the UCA's two minor children. On May 15, 2024, the Honorable Magistrate Judge  
2 Brian Tsuchida, United States District Court for the Western District of Washington,  
3 authorized warrant MJ24-292 to obtain real-time GPS location data for MCCOOL's cell  
4 phone number to track MCCOOL's travel from Portland, Oregon to Seattle, Washington on  
5 May 16, 2024.

6 25. On May 16, 2024, MCCOOL traveled from Portland, Oregon to Seattle,  
7 Washington to meet with the UCA to engage in sexual activity with the UCA's 7-year-old  
8 and 11-year-old children at a designated hotel. MCCOOL traveled via train to Washington  
9 State and then utilized a rideshare to travel to the designated hotel where he knocked on the  
10 door and was arrested. A search of MCCOOL's person incident to arrest yielded condoms,  
11 baby oil, rope, and stuffed animals.

12 //

13 //

III. CONCLUSION

26. The affidavit and application are being presented by reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3).

27. Based on the above facts, I respectfully submit that there is probable cause to believe that MARC DAVID MCCOOL committed Attempted Enticement of a Minor in violation of Title 18, United States Code, Section 2422(b), and Travel with the Intent to Engage in a Sexual Act with a Minor in violation of 18 U.S.C. Section 2423(b).



Digitally signed by AUDREY J  
NGADIRAN  
Date: 2024.05.16 16:14:33  
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AUDREY NGADIRAN, Complainant  
Special Agent  
Homeland Security Investigation

The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone on this 17th day of May, 2024.



PAULA L. MCCANDLIS  
United States Magistrate Judge